# **Remarks**

Reconsideration and reexamination of the above-identified patent application, as amended, are respectfully requested. Claims 1-3, 5-8, and 10-11 are pending in this application upon entry of this Amendment. In this Amendment, the Applicant has amended claims 1, 6, and 11; and cancelled claims 13-16 and 18-20. No claims have been added in this Amendment. Of the pending claims, claims 1, 6, and 11 are the only independent claims.

#### Claim Rejections - 35 U.S.C. § 102

In the Office Action mailed October 28, 2005, the Examiner rejected claims 1-3, 5-8, 10-11, 13-16, and 18-20 under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent No. 5,235,328 issued to Kurita ("Kurita"). The Applicant believes that the claimed invention is patentable over Kurita and has amended independent claims 1, 6, and 11 to more clearly define thereover.

## 1. The Claimed Invention

The claimed invention, as set forth in amended independent claims 1, 6, and 13, is generally directed to a keyless authorized access control system operable for communicating with transceivers assigned to objects, and to an identification device for such a system.

As set forth in representative amended independent claim 6, the identification device includes a base module and at least two object modules. The base module has at least two interfaces and is operable to communicate commands to the transceivers assigned to the objects. Each object module is assigned to a respective one of the objects. Each object module has a memory chip containing a code attuned to the assigned object. Each object module is interchangeably connected to the base module through a respective one of the interfaces such that a first one of the object modules is interchangeably connected to the base module through a first one of the interfaces while a second one of the object modules is interchangeably

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connected to the base module through a second one of the interfaces. Each object module has a button operable for activating the base module to communicate to the transceiver assigned to the object that is assigned to the object module a command having the code attuned to the assigned object when the object module is connected through the respective one of the interfaces to the base module.

## 2. Kurita

The Examiner posited that Kurita discloses a remote command apparatus as recited in independent claims 1, 6, and 11 (generally citing Figs. 1-9 and respective portions of the apparatus and method). The Examiner posited that Kurita discloses an identification device (i.e., a remote commander; Fig. 1) having a base module (1) (i.e., a commander main body) operable to communicate commands to the transceiver assigned to the objects (i.e., an electrical apparatus such as VTR, TV, or CD) (citing col. 3, lines 30-43; col. 4, line 59 to col. 5, line 34; and Figs. 1 and 5). The Examiner further posited that the identification device of Kurita has at least two object modules (2A) (i.e., ROM cards and RAM cards), each object module being assigned to a respective one of the objects (citing col. 3, lines 30-64; col. 4, lines 36-64; and Figs. 1-7), each object module having a memory chip (30) (i.e., ROM chip) containing a code (i.e., command data) attuned to the assigned object (citing col. 5, lines 21-34; and Figs. 6-9).

## 3. The Claimed Invention Compared to Kurita

The claimed invention generally differs from Kurita in that the identification device includes a base module (BM) and at least two object modules assigned to respective objects in which the BM has at least two interfaces, each object module (OM) is interchangeably connected to the BM through a respective one of the interfaces such that a first OM is interchangeably connected to the BM through a first one of the interfaces while a second OM is interchangeably connected to the BM through a second one of the interfaces, and each OM has a button operable for activating the BM to communicate to the transceiver assigned

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to the object that is assigned to the OM a command having the code attuned to the assigned object when the OM is connected through the respective one of the interfaces to the BM.

In contrast to the claimed invention, Kurita discloses that its commander main body (1) has a single connector portion (7) for receiving one single ROM or RAM card at a time. In particular, Kurita discloses:

It is understood that only one such [ROM or RAM] card is electrically connected to the circuitry of commander main body 1, with the other cards simply being stored for future use. Thus, among guide grooves 6 formed in section 5, connector portion 7 is formed only at the position corresponding to the top one of guide grooves 6. On the other hand, the electrical contact portions 31 are formed along the front edge of all ROM cards 2A, or RAM cards.

Therefore, among a plurality of ROM cards 2A, or RAM cards, enclosed in open section 5 of remote commander main body 1, the electrical contact portion 31 of the ROM card 2A that is enclosed in the top stage is coupled with connector portion 7 of remote commander main body 1. (Col. 4, lines 12-26 of Kurita; see also, for example, Fig.1; col. 3, lines 61-64; col. 4, line 65 through col. 5, line 7; and col. 5, lines 29-34 of Kurita.)

Thus, Kurita does not teach or suggest having a first OM interchangeably connected to the BM through a first interface of the BM while a second OM is interchangeably connected to the BM through a second interface of the BM as claimed.

As a result, the Applicant believes that independent claims 1, 6, and 11, as amended, are patentable over Kurita. Claims 2-3 and 5 depend from amended independent claim 1 and include all of the limitations therein; and claims 7-8 and 10 depend from independent claim 6 and include all of the limitations therein. Accordingly, the Applicant respectfully requests reconsideration and withdrawal of the rejection to claims 1-3, 5-8, and 10-11 under 35 U.S.C. § 102(b) in view of Kurita.

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#### **CONCLUSION**

In summary, claims 1-3, 5-8, and 10-11, as amended, meet the substantive requirements for patentability. The case is in appropriate condition for allowance. Accordingly, such action is respectfully requested.

If a telephone or video conference would expedite allowance or resolve any further questions, such a conference is invited at the convenience of the Examiner.

Respectfully submitted,

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